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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Mailing Online Service

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-26)
February 4, 1999

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits an interrogatory and requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Acting Director

Office of the Consumer Advocate

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Emmett Rand Costich

Acting Assistant Director

Office of the Consumer Advocate

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OCA/USPS-26. Please refer to Bi-Weekly Data Reports for A/P 3, Weeks 1-4, and A/P 4, Weeks 1 and 2.

- a. Please confirm that none of the Qualification Reports contained in these Bi-Weekly Reports shows a depth of sort deeper than Automation Basic. If you do not confirm, please provide the dates and number of pieces on the Qualification Reports showing a deeper depth of sort.
- Please refer to the Qualification Report dated November 5, 1998, for a mailing of 1085 pieces.
 - i. Please confirm that this mailing consisted of two trays. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
 - ii. Please confirm that the first tray contained 647 pieces. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
 - iii. Please confirm that the first tray was 3-digit tray. If you do not confirm, please explain the meaning of the entry "3DG" in the column labeled "Tray Level."
 - iv. Please explain why the pieces in the first tray are not listed under the column labeled "3B."
- Please refer to the Qualification Report dated November 6, 1998, for a mailing of 802 pieces.

- Please confirm that this mailing consisted of six trays. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
- ii. Please confirm that the first tray contained 25 pieces. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
- iii. Please confirm that the first tray was 3-digit tray. If you do not confirm, please explain the meaning of the entry "3DG" in the column labeled "Tray Level."
- iv. Please explain why the pieces in the first tray are not listed under the column labeled "3B."
- d. Table 3 of the Bi-Weekly Report for A/P 3, weeks 3 and 4, lists Batch Number B0000051 with Status Date of 11/23/98 as containing 1085 pieces. Appendix 1 of the Bi-Weekly Report for A/P 3, weeks 1 and 2, lists Batch B0000051 with Date Received of 11/20/98. However, neither of these Bi-Weekly Reports appears to contain a Qualification Report for Batch B0000051. Please provide a copy of the Qualification Report for Batch B0000051 or explain why no report exists.
- e. Please refer to the Qualification Report dated December 17, 1998, for a mailing of 1249 pieces.
 - i. Please confirm that this mailing consisted of five trays. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.

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- ii. Please confirm that the first tray contained 51 pieces. If you do not confirm, please provide the correct number and identify where this number appears on the Qualification Report.
- iii. Please confirm that the first tray was 3-digit tray. If you do not confirm, please explain the meaning of the entry "3DG" in the column labeled "Tray Level."
- iv. Please explain why the pieces in the first tray are not listed under the column labeled "3B."

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Emmett Rand Costich

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Attorney

Washington, D.C. 20268-0001

February 4, 1999